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July 25, 2000

REC'D TH
REGULATORY AUTH.
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EXECUTIVE

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: Tariff Filings by all Telephone Companies Regarding Reclassification of
Pay Telephone Service as Required by FCC Order 96-439
Docket No. 97-00409


Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the data requests filed on
behalf of the Tennessee Payphone Owners Association in the above captioned proceeding.

Copies are being served on counsel of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl
Enclosure

POSTED
7-26-00

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: ALL TELEPHONE COMPANIES TARIFF FILINGS REGARDING
RECLASSIFICATION OF PAY TELEPHONE SERVICE AS REQUIRED
BY FCC DOCKET 96-128
Docket No. 97-00409**

REC'D TN
REGULATORY AUTH.
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EXECUTIVE SECRETARY

**FIRST SET OF DATA REQUEST FROM TENNESSEE PAYPHONE OWNERS'
ASSOCIATION TO CITIZENS TELECOMMUNICATIONS COMPANY OF
TENNESSEE AND CITIZENS TELECOMMUNICATIONS COMPANY OF THE
VOLUNTEER STATE**

DEFINITIONS

1. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of Citizens Telecommunications Company of Tennessee and Citizens Telecommunications Company of the Volunteer State ("Company" or "Citizens"), including but not limited to correspondence, memoranda, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons,

evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

2. The term "refer or relate to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

3. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within Company's possession, custody or

control as well as in the possession, custody or control of Company's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

6. For each data request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DATA REQUEST

REQUEST NO. 1. For each rate element related to Citizens's payphone access service, identify the following:

- a) the direct cost
- b) the shared (or joint) cost directly attributable to the rate element
- c) the level of common costs that Citizens believes to be appropriate to be included in the rate

RESPONSE:

REQUEST NO. 2. What categories of cost (e.g. shared, common, other) does Citizens believe are appropriately included in the definition of "overhead costs" when applying the FCC's new services test?

RESPONSE:

REQUEST NO. 3. What is Citizens's definition of a "cost based rate"?

RESPONSE:

REQUEST NO. 4. What is the maximum markup permitted above direct cost that is consistent with Citizens's definition of a "cost based rate?"

RESPONSE:

REQUEST NO. 5. What is the maximum markup permitted above the sum of direct, shared, and common cost that is consistent with Citizens's definition of a "cost based rate?"

RESPONSE:

REQUEST NO. 6. In previous state proceedings into the appropriate level of cost based rates for payphone access services, Citizens has identified certain costs as "TELRIC Costs." Provide a complete definition of the term "TELRIC" as Citizens intends it to be understood in this context, including a detailed description of the methodology used by Citizens to develop these costs.

- a) Is the term "TELRIC" intended to mean only the direct costs associated with the rate element in question?
- b) Is the term "TELRIC" intended to mean the direct plus shared costs associated with the rate element in question?
- c) Is the term "TELRIC" intended to mean the direct plus shared plus common costs associated with the rate element in question?
- d) If the answer to a, b, and c above are no, provide a complete description of the categories of cost that are included in Citizens's definition of TELRIC, and explain in detail why Citizens believes that each category should be included.

RESPONSE:

REQUEST NO. 7. Provide the following characteristics for local calls made on payphone access lines within Citizens's Tennessee service territory:

- a) percentage of intra-office calls
- b) percentage of inter-office calls
- c) percent tandem transit
- d) average airline miles of transport for inter-office calls
- e) average calls per month per line
- f) average minutes per call per line

RESPONSE:

REQUEST NO. 8. Provide Citizens's most recent calculation of the following costs (including separately identified direct, shared, and common costs). Provide all supporting work papers and documentation.

- a) end office switching, per MOU
- b) end office trunk port, per MOU
- c) tandem switching per MOU
- d) tandem office trunk port, per MOU
- e) common transport per mile
- f) common transport termination

RESPONSE:

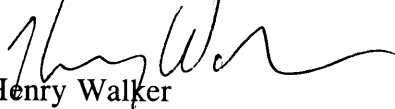
REQUEST NO. 9. Please state whether it is Citizens's policy in Tennessee to provide payphone access lines to business addresses only, or whether Citizens is willing to provide a payphone access line at a residential address.

RESPONSE:

REQUEST NO. 10. For each rate element related to Citizens' payphone access service, identify the cost of that element using the same methodology, assumptions, and TRA-ordered adjustments as found in the most recent cost study filed by BellSouth Telecommunications, Inc. in TRA docket no. 97-01262 (the UNE cost docket).

RESPONSE:

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Walker", written over the printed name.

Henry Walker

BOULT, CUMMINGS, CONNERS & BERRY, PLC

414 Union Street, Suite 1600

P.O. Box 198062

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Counsel for Tennessee Payphone Owners' Association

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2000 a copy of the foregoing document was served on the parties of record, via U.S. Mail, addressed as follows:

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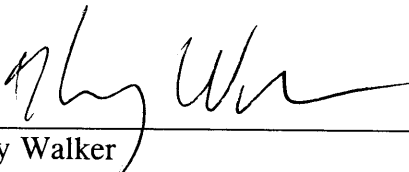
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